

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10068 (CTG)

(Joint Administration Requested)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that Mann Enterprises, Inc., by its attorneys, **PROCOPIO, CORY, HARGREAVES & SAVITCH LLP**, appears in this matter pursuant to Bankruptcy Rules 2002 and 9010 and Sections 102(1), 342 and 1109 (b) of the Bankruptcy Code and requests that all notices given or required to be given in this case and all papers served or required to be served in this case, be given to and served upon the following:

Procopio, Cory, Hargreaves & Savitch LLP
525 B Street, Suite 2200
San Diego, CA 92101
Telephone: (619) 238-1900
Facsimile: (619) 235-0398
Email: gerald.kennedy@procopio.com
Attn: Gerald P. Kennedy, Esq.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motions, petitions, pleadings, requests, complaints, demands, disclosure statements, plans of

¹The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

reorganization, and answering or reply papers whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopier or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to recoupments to which the Landlord is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

DATED: January 16, 2025

/s/ Gerald P. Kennedy

Gerald P. Kennedy
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Attorney for Mann Enterprises Inc.

CERTIFICATE OF SERVICE

I certify that on January 16, 2025, a copy of the foregoing **NOTICE OF APPEARANCE AND REQUEST FOR NOTICE** was filed electronically. Notice of this filing will be sent to all parties registered to receive electronic notices through the Court's CM/ECF system. Parties may access this filing through the Court's PACER system.

DATED: January 16, 2025

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

By: /s/ Gerald P. Kennedy
Gerald P. Kennedy (CA Bar No. 105887)
PROCOPIO, CORY, HARGREAVES
& SAVITCH LLP